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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Patrick S. Dugan, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI). I graduated from the FBI Academy in May 1997, and assigned to the FBI's Baltimore Field Office since that time. I am currently responsible for investigating violent crimes, to include bank and armored carrier robberies, armed commercial robberies, and the apprehension of federal fugitives.

2. I make this affidavit in support of an application for a criminal complaint and arrest warrant charging Michael Lonesome, age 31, described further in Attachment 1, with violations of 18 U.S.C. § 2113(a) (e), and (f) (Bank Robbery); 18 U.S.C. § 1951(a) (Conspiracy to Commit Hobbs Act Robbery); and 18 U.S.C. § 924(c) (Use, Carry and Brandish a Firearm During and in Relation to a Crime of Violence).

3. The facts in this affidavit come from information obtained from other agents and law enforcement officers, witnesses, my knowledge, training and experience, and personal observations. This affidavit is intended to show there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

4. On March 15, 2017, Dajuan Bonaparte, Kendall Alexander, and Danyelle Sykes were indicted for Conspiracy to Commit Hobbs Act Robbery in violation of 18 U.S.C. § 1951(a) related to the December 28, 2016 robbery of the Weis Market in Woodstock, Maryland. *See United States v. Bonaparte*, JFM-17-145. Bonaparte and Alexander were also charged with Hobbs Act Robbery, in violation of 18 U.S.C. § 1951(a) and Brandishing a Firearm in a Crime of Violence, in violation

of 18 U.S.C. § 924(c). Alexander was also charged with Possession of a Firearm by a Prohibited Person, in violation of 18 U.S.C. § 922(g). Investigators believe others individuals were involved in the December 28, 2016 robbery and that this group committed other robberies, as outlined further below.¹

A. PNC Bank Robbery

5. On November 22, 2016, at approximately 12:00 PM, four individuals robbed the PNC Bank located at 1000 Fleet Street, Baltimore, Maryland. After exiting their vehicle, the robbers assaulted a customer who was using an exterior ATM near the front door of the bank, and forced the customer at gunpoint to accompany them into the lobby of the bank.² Subject 1, holding the customer from the rear in a headlock and pointing a handgun to the customer's head and at others in the bank, stood near the teller counter while Subject 2 vaulted the counter, taking cash from several teller stations and placing the stolen money in a backpack. Subject 3 stood in the lobby, while Subject 4 stood near the doors of the bank, with both men acting as lookouts. After Subject 2 jumped back over the counter, all four robbers fled the bank, leaving the hostage behind with the other customers and employees. Witnesses saw the robbers flee the area in a black Acura MDX SUV and were able to note the license plate of the vehicle.³

6. Officers from the Baltimore City Police Department (BPD) and FBI responded to the bank. The bank's video surveillance system recorded the incident and the bank provided images of the

¹ Specifically, the November 22, 2016 robbery of the PNC Bank at 1000 Fleet Street, Baltimore, Maryland, and the December 18, 2016 robbery of the Weis Market located at 10825 Birmingham Way, Woodstock, Maryland.

² PNC Bank is insured by the Federal Deposit Insurance Corporation (FDIC). PNC Bank representatives conducted an audit subsequent and determined a loss in the amount of \$5,360.00 in US currency.

³ The Acura MDX described above was stolen from a residence in the Canton section of Baltimore, Maryland during the overnight hours of November 21-22, 2016.

robbery to investigators. Investigators obtained a description of the robbers from witness statements and review of the surveillance video, and determined the subjects to be black males, approximately 20-30 years old, wearing black or dark colored clothing, gloves, and face masks.

B. First Weis Market Robbery

7. On December 18, 2016, at approximately 6:38 AM, three individuals robbed the Weis Market, located at 10825 Birmingham Way, Woodstock, Maryland. One robber brandished a sawed-off shotgun; another brandished a handgun.⁴ One subject acted as a lookout, while the other two bound multiple employees with zip ties and forced them into the store's office at gunpoint, demanding they open the safe. One subject brought a dark colored backpack to the scene, and used it to carry the proceeds from the robbery. After taking cash and U.S. postage stamps from the office, the three subjects fled the store. Officers from the Howard County Police Department ("HCPD") responded to the store. Police obtained a description of the robbers from witness statements and review of the surveillance video, and determined the three subjects to be black males, approximately 20-30 years old, wearing black or dark colored clothing, gloves, and face masks.

C. Second Weis Robbery

8. On December 28, 2016, at approximately 6:35 AM, five individuals robbed the same Weis Market. One robber brandished a sawed-off shotgun. One robber had a handgun.⁵ Several of the subjects acted as lookouts, while the others forced employees into the store's office at gunpoint and demanded they open the safe. One subject brought a backpack to the scene, and used it to

⁴ Weis Market, a regional grocery store, operates in interstate commerce as defined in 18 U.S.C. § 1951 and 18 U.S.C. § 10. An audit conducted subsequent to the robbery determined a loss of approximately \$20,365.00 in U.S. currency and \$3,507.00 in U.S. postage stamps.

⁵ An audit conducted subsequent to the robbery reflected a loss in the amount of approximately \$17,886.27 in U.S. currency.

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carry the proceeds from the robbery. After taking cash from the office, the five subjects fled the store. Officers from HCPD and the FBI responded to the store. Investigators obtained a description of the robbers from witness statements and review of the surveillance video, and determined the five subjects to be black males, approximately 20-30 years old, wearing black or dark colored clothing, gloves, and face masks.

9. Based upon the physical description of the subjects, the similarities in clothing worn by the subjects, the level of violence perpetrated on victims and other consistencies in modus operandi, such as the use of a dark backpack, investigators believe that the same group of individuals committed the three robberies.

10. Police located a suspicious vehicle immediately after the robbery in the area of the Weis Market and attempted to stop the vehicle. The driver of the vehicle sped away, and officers initiated a pursuit, which was quickly terminated due to safety concerns. A short time later, a hit and run was reported near the last known location of the vehicle. Officers approached two individuals near the wrecked vehicle, who subsequently attempted to flee the area. After a brief foot pursuit, police detained and subsequently arrested the two subjects: Kendell Charles Alexander Jr., ("Alexander") and Dajuan Bonaparte, ("Bonaparte"). Among the items recovered at the scene was a backpack containing U.S. currency consistent with that taken during the robbery, a cell phone belonging to Alexander, clothing matching the description of that worn by the robbers, and a loaded handgun matching the description of the weapon used by one of the subjects.

11. Also located at the scene was Danyelle Denise Sykes, ("Sykes"). She told officers she was Alexander's girlfriend and was there to pick him up. Sykes voluntarily reported with her vehicle to the HCPD Northern Precinct.

12. Sykes provided consent to search her vehicle and her cellphone. Investigators searched the car and recovered zip ties consistent with those used in the robbery described above; a printed list of Weis Markets in the greater Baltimore area with the store located at the Security Square Mall in Woodlawn, Maryland highlighted; hand-written directions to the Weis Market in Woodstock; and a hand-drawn map of the interior of the Weis Market in Woodstock, which included identification of the location of the store's office where the safe was located.

13. A Howard County Circuit Court judge authorized a search warrant for Alexander's cell phone. Additionally, investigators also obtained a court order for subscriber, toll records, geographic location data and other information for Alexander's cell phone.

14. Investigators interviewed Bonaparte and Alexander and both gave voluntary statements, confessing to perpetrating the December 28, 2016 robbery.

D. Identification of Robbery Suspect Michael Lonesome, aka "Lonely"

15. Investigators learned Alexander is close friends with an individual named Michael Lonesome (and nicknamed "Mike" and "Lonely,"). Alexander and Lonesome met in jail several years ago and are Facebook "friends." Subsequent to his arrest on December 28, 2016, Alexander spoke with family members on a recorded jail line. On December 30, 2016, he spoke with at least one family member who stated she was relaying messages from "Mike," and asked "Mike," what he wanted relayed to Alexander. The woman asked Alexander, "Where the cell phones at with the Jamaican?" Alexander replied, "What?" The woman stated again, "Where the cell phones at with the Jamaican?" Alexander, growing exasperated, said "What? Tell him I don't know what the fuck he talking about." The woman relayed the answer to "Mike," and then asked Alexander "Where the chicken at?" Alexander, growing more irate, responded, "What you mean? They got the fucking chicken. They got all of the chicken." The woman relayed to

“Mike,” that “they got all of the chicken.” Alexander then stated, “Man, that’s why I need you all to come up here . . . because I can’t say what I want to say on this phone.” I believe that these discussions were an attempt to speak in code regarding the proceeds of the Weiss Supermarket robbery. Investigators recovered all of the proceeds of the robbery (“the chicken”) when they arrested Bonaparte and Alexander.

16. On January 3, 2017, Alexander made another recorded jail call to his family. He instructed them, in sum and substance, to “relay” to “Lonely” that they “needed to get on that other shit asap . . . that Security Job,” and to tell them that “if they want, I got a driver.” Investigators believe these instructions mean that Lonesome should be prepared to conduct a robbery at the Security Square Mall Weis Market, which was highlighted in the document recovered in Sykes’ vehicle, as described above.

17. Examination of data extracted from Alexander’s cellphone, open source social media sites and other sites available to law enforcement identified the cell phone number associated with Michael Lonesome. Pursuant to a court order issued February 24, 2017 by the Honorable Stephanie A. Gallagher, United States Magistrate Judge, investigators obtained subscriber, toll records, geographic location data and other information were obtained for Lonesome’s cell phone. A review of these toll records indicates approximately 20 telephone calls between Lonesome and Alexander in the hours prior to the November 22, 2016 PNC Bank robbery.

18. Investigators analyzed the geographic location data obtained from Lonesome and Alexander’s cell phones. On November 22, 2017, both phones were physically located in close proximity to each other in the immediate vicinity of the PNC Bank a short time prior to the robbery, and were also located in close proximity to each other several hours later in the immediate vicinity of 704 North Luzerne Avenue, Baltimore, Maryland, the known residence of

Antionette Holmes, the mother of Alexander's infant child. Additionally, Lonesome's cell phone made 15 telephone calls to Alexander's cell phone between 7:15-8:00 AM on December 28, 2016, which is the approximate time Alexander and Bonaparte were taken into custody following the second Weis Market robbery. Investigators have also located Facebook messages between Alexander and Lonesome on or about the times of the robberies. Michael Lonesome also meets the physical description of the subject in the bank robbery.

19. I know from my training and experience that individuals involved in complex robberies such as those described above often communicate their plans via cell phone, as well as text and social media messaging, and travel to and from the scenes of the robberies in the same vehicle. Following a robbery, the suspects also often meet at a pre-determined location to divide the robbery proceeds between the participants. Lonesome's cell phone activity appears consistent with his having participated in the robbery of the PNC Bank, and continuing as part of the conspiracy to rob the Weiss Supermarket.

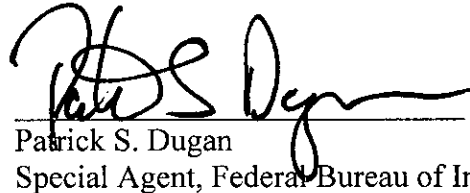
CONCLUSION

20. Based on my knowledge, training and experience, and the facts set forth above, I respectfully submit there is probable cause to believe that Michael Lonesome participated in the planning and execution of the November 22, 2016 robbery of PNC Bank, 1000 Fleet Street, Baltimore, Maryland. That robbery was part of a larger conspiracy, which also included the December 18, 2016 robbery of Weis Market, 10825 Birmingham Way, Woodstock, Maryland, and the December 28, 2016 robbery of Weis Market, 10825 Birmingham Way, Woodstock, Maryland. Accordingly, there is probable cause to believe that Michael Lonesome violated 18 U.S.C. § 2113(a) (e) (f) (Bank Robbery), 18 U.S.C. § 1951(a) (Conspiracy to Commit Hobbs Act Robbery), and 18 U.S.C. § 924(c) (Use, Carry and Brandish a Firearm During and in Relation to

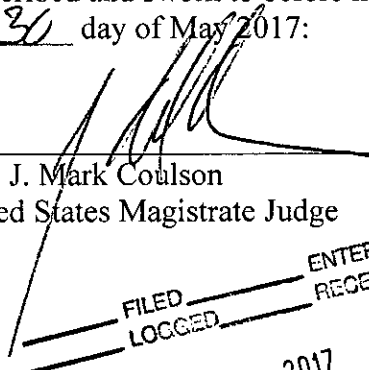
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a Crime of Violence).

21. I affirm under penalty of perjury that the facts and circumstances outlined in this affidavit are true and accurate to the best of my knowledge and belief.



Patrick S. Dugan
Special Agent, Federal Bureau of Investigations

Subscribed and sworn to before me
this 30 day of May 2017:


Hon. J. Mark Coulson
United States Magistrate Judge

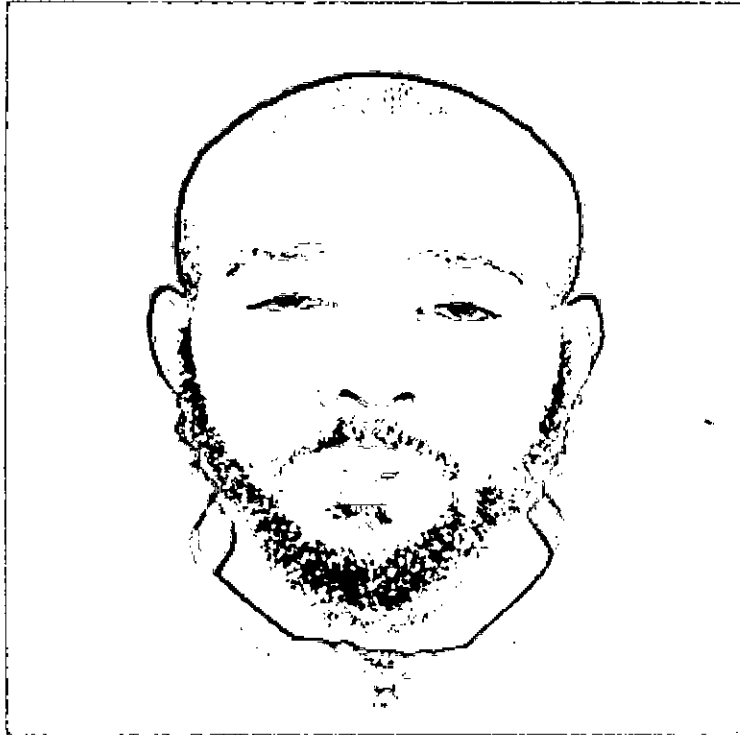
FILED _____ ENTERED _____
LOGGED _____ RECEIVED _____

MAY 30 2017

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY 

ATTACHMENT A1

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MICHAEL LONESOME

Sex: Male

Race: Black,

Height: 5'10"

Weight: 160 lbs.

Hair: Black

Eyes: Brown

FBI Number: 778174CC3

State Identification Number: Maryland 2485396